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February 22, 1991

Mr. Leonard Bolton WKEU Radio 1000 Memorial Drive Griffin, GA 30224

Dear Leonard:

I have received a verbal offer from group owner Dallas Tarkenton in the amount of 2.3 million for WKEU AM/FM.

This can be structured as an all cash price.

Please call me if you have any questions.

Bob Therburn

RMT:ms

EXHIBIT E

STATEMENT OF KARL SCHAFFENBERGER

Karl Schaffenberger QUESTIONED DOCUMENT EXAMINER 173 North Park Drive New Milford, New Jersey 07848

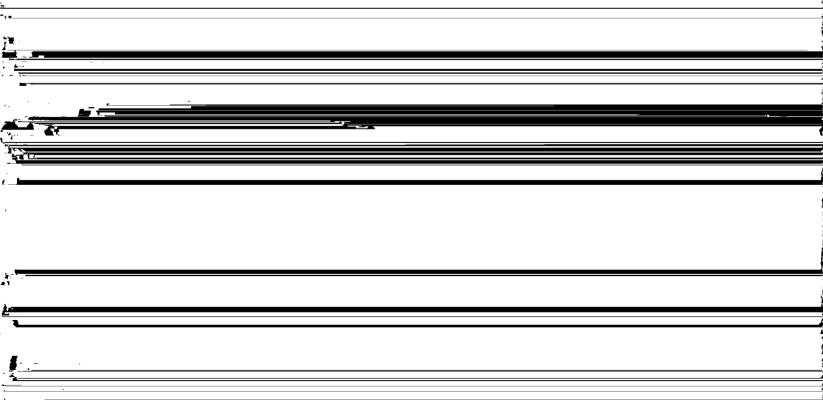
Phone (201) 261-6060

I, Karl Schaffenberger, state under penalty of perjury as follows:

I am a Questioned Document Examiner and have been so employed for sixteen (16) years. My resume is attached.

I have examined thirty five (35) disputed signatures of Christopher N. Tarkenton, Dallas M. Tarkenton, III and Stephen D. Tarkenton and compared them to thirty two (32) signatures of Dallas M. Tarkenton. This was done in an effort to determine whether any of the disputed signatures are by the hand of Dallas M. Tarkenton.

The four (4) disputed signatures of Christopher N. Tarkenton (Q-1 through Q-4) are, in all probability, by the same hand. I have compared the disputed signatures to the signature of Christopher N. Tarkenton appearing on the Voter Registration Card (739676) and have reason to suspect that they are not by the same hand. Unfortunately $\frac{1}{2}$



Re: Dallas M. Tarkenton (page 2)

This examination has produced more questions than answers. The proper way to resolve these issues would be through the appropriation and examination of original documents (all the documents examined were photocopies with the exception of 1 FAX copy) as well as adequate standards for the signatures of Christopher N. Tarkenton, Dallas M. Tarkenton, III and Stephen D. Tarkenton.

Respectfully submitted,

Karl Schaffenberger Document Examiner

September 17, 1991

Attn: James S. Blitz, Esq.
ARENT, FOX, KINTNER, POLTKIN & KAHN
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5339

RESUME: July 1990

Phone (201) 261-6060

General Education

- Fairleigh Dickinson University (1969-1978)
- Bergen Community College (1977)

Training in Handwriting Identification and Forensic Seminars

- Apprenticeship under the direction of Norman G. Werling, CDE (1975-1978)
- International Graphoanalysis Society General Course leading to Certification (1975-1976)
- International Graphoanalysis Society Congress: Chicago, Illinois (July 1976)
- World Association of Document Examiners Annual Seminar: Chicago, Illinois (July 1976)
- New York Chapter of Graphoanalysts Seminar on Questioned Document
 Examination: Victor, New York (October 1976)
- Independent Association of Questioned Document Examiners Congress:
 Dayton, Ohio (October 1976)
- Independent Association of Questioned Document Examiners Congress:

 Panama City, Florida (September 1977)

 Presentation: "Alternatives to the Darkroom"
- National Association of Document Examiners Spring Seminar: Princeton, New Jersey (May 1980)
- National Association of Document Examiners Annual Conference:
 Princeton, New Jersey (September 1980)
- National Association of Document Examiners Spring Seminar:
 Princeton, New Jersey (May 1981)
- National Association of Document Examiners Annual Conference:

 White Haven, Pennsylvania (September 1981)

 Presentation: "Potpourri"
- National Association of Document Examiners Spring Seminar: Rochelle Park, New Jersey (April 1982) Presentation: "The Lindbergh Case"
- National Association of Document Examiners Annual Conference: Philadelphia, Pennsylvania (October 1982)
- National Association of Document Examiners Spring Seminar: Saddle Brook, New Jersey (April 1983)
- World Association of Document Examiners Northeast Regional Seminar: Providence, Rhode Island (April 1984)
- World Association of Document Examiners Annual Seminar: Chicago, Illinois (August 1985)

Training and Forensic Seminars (Continued)

- World Association of Document Examiners Annual Seminar:

Chicago, Illinois (July 1986)

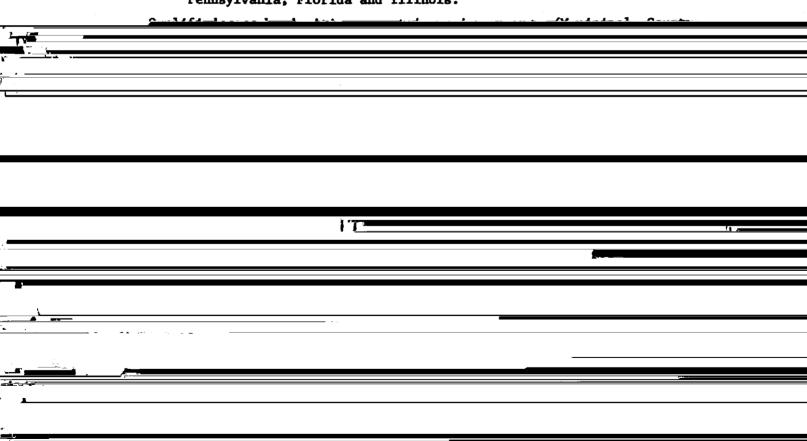
Presentation: "Handling the Petition"

- World Association of Document Examiners Northeast Regional Seminar:

Rochelle Park, New Jersey (March 1988) Presentation: "Graphing a Dissection"

Professional Activities

- Member: World Association of Document Examiners (1976-1979) (1984-
- Past Memberships:
 - Independent Association of Questioned Document Examiners (1976-1980)
 - National Assocation of Document Examiners (1979-1983)
 - Charter Member
 - Member of the Board of Examiners
 - 1981 Conference Chairman
- Instructor and lecturer on the principles and techniques of forensic handwriting comparison and identification in New Jersey, New York, Pennsylvania, Florida and Illinois.



CLIENTS - CONSULTATIONS

OKIN, COHEN & HOLLANDER One Parker Plaza Fort Lee, N.J. 07024

ROSEN & AVIGLIANO 425 Route 10 Randolph, N.J. 07869

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WALSH, MARONEY & PONZINI 14 North Broadway Tarrytown, N.Y. 10591

BRAVERMAN & LESTER 374 Main Street Hackensack, N.J. 07602

CIBA-GEIGY Corporation 556 Morris Avenue Summit. N.I. 07901 BEATTIE PADOVANO 50 Chestnut Ridge Road P.O. Box 244 Montvale, N.J. 07645-0244

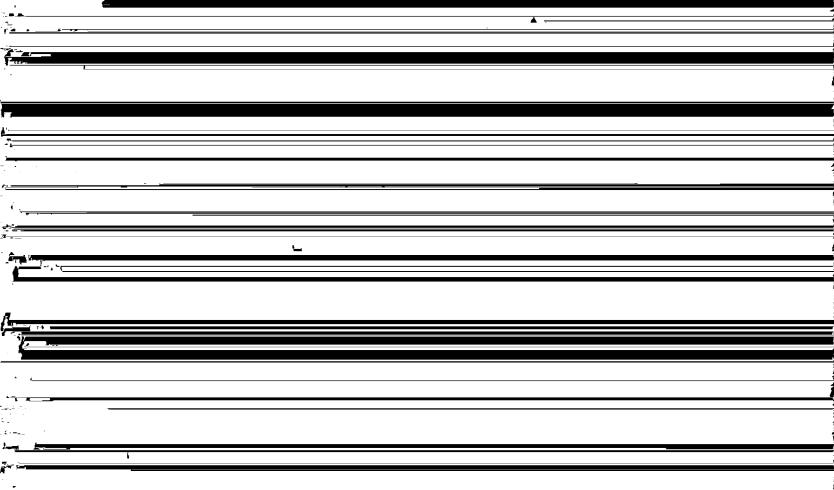
Daniel C. Kleeman, Esq. 100 Hamilton Plaza Suite 1218 Paterson, N.J. 07505

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NAGEL & RICE



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David Hoffman, Esq. 15 Brookside Avenue P.O. Box 132 Cresskill, N.J. 07626

UNITED JERSEY BANK FINANCIAL CORPORATION Office of the General Counsel 301 Carnegie Center P.O. Box 2066 Princeton, N.J. 08543-2066

Bronna G. Levin, Esq. 520 Westfield Avenue Suite 302 Elizabeth, N.J. 07208

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Stephen Vasak, Esq. One University Plaza Hackensack, N.J. 07601

HANOVER INSURANCE COMPANY 330 South Randolphville Road Piscataway, N.J. 08855

CIFELLI & DAVIE 334 Harrison Avenue Harrison, N.J. 07029 MURJANO INTERNATIONAL, LTD. 95 Mayhill Street Saddle Brook, N.J. 07662

TNT SKYPAK INTERNATIONAL EXPRESS 65 Willowbrook Boulevard Wayne, N.J. 07470

MAC-JO ASSOCIATES
PROGRESSIVE SECURITY, INC.
391 Wildrose Avenue
Bergenfield, N.J. 07621

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Newark, N.J. 07101

MIDLANTIC NATIONAL BANK Metro Park Plaza P.O. Box 600 Edison, N.J. 08818

Richard De La Roche, Esq. 3912 Bergen Turnpike Union City, N.J. 07087

OURY, DeCLEMENTE, MIZDOL & BIEDERMAN One Parker Plaza Fort Lee, N.J. 07024

Donald R. Venezia, Esq. 280 Baldwin Avenue Jersey City, N.J. 07306

FIRST FIDELITY BANK 18 Washington Place Newark, N.J. 07102

ST. JOHNSBURY TRUCKING COMPANY 447 Hollywood Avenue South Plainfield, N.J. 07080

DYER, HENDREN & HARRINGTON 7 North Main Street Medford, N.J. 08055

BYRNES & O'BRIEN Security Consultants, Inc. 574 Mt. Prospect Avenue Clifton, N.J. 07012

ROTHSCHILD, INC. One Rockefeller Plaza New York, N.Y. 10020

Christopher n. Darkenton 5/31/88 Christophe n. Tarkenton Q-25/31/88 Christophe of Tarkenton 5/31/88 Christoph 1. Tabo. D. 9/3/88

Steplen E. Vestent Q - 209/22/87 Steplan D. Jarkenst 0 - 219/28/87 Stephen W. Vankent 0-22 10/19/87 Steples D. Tarkenter 0 - 239/29/88 Stepa D. Tonke ton 0-24 4/16/90 Stepe D. Tank-Q - 254/16/90 Q-26 5/25/90 Star Taket 0 - 27173 North Park C 7/2/90 Q-28 7/2/90

Dallas M. Varket

K-1 11/20/81

Karl Schaffenberger JESTIONED DOCUMENT TYAMIN 173 North Park L

Lallan M. Jacker L

K-2 7/27/82

K-3 9/1/82 Wallas M. Vackestor K-411/10/83 Sinc Wallas M. Vackert K-5 11/16/83 Callas M. Vackert K-6 /22/84 K-7 10/1/85 Q-6 10/1/85

QUESTIONED DOCUMENT FT NIN

173 North Park D. _____
New Milford, New Jersey 0782

Sinc Valles M. Valkent Dal K-8 10/28/85 allow M. Valkentor K-9 11/18/85 Q-7 12/5/85 Q-8 12/12/85 Nallas M. Vackers K-10 1/17/86

K-11 7/28/87 Raga Partner K-12 10/24/88 Iņć. K-13 12/1/89 K-14 2/8/90 Respect K-15 2/8/90 Tarkenton Applicant

Karl Schaffenberger QUESTIONED DOCUMENT EXAMBLER 173 North Park Drive New Milford, New Jersey 07646

K-16 4/10/90 K-17 4/10/90 K-18 4/16/90 Respe K-19 4/23/90 Applicant K-20 8/2/90

Karl Schaffenberger QUESTIONED DOCUMENT EY * WINER 173 North Park Dr New Milford, New Jersey 07646

	Resp Colon Culcul Dallas M. Tarkenton Applicant	K-21 8/3/90
	Resp M. Vackenton	K-22 8/21/90
· <u>-</u>	Resp // / / / / / / / / / / / / / / / / /	K-23 11/29/90
1, #		
	<i>(-</i>	
#		

K-25 12/7/90

Dallas M. Tarkenton

Applicant

Respe

Dallas M. Tarkenton

K-26 12/10/90

K-27 12/10/90

Dallas M. Tarkenton

Kari Schaffenberger QUESTIONED DOCUMENT EXAMINER 173 North Park Drive New Milford, New Jersey 0764b

Dallas M. Tarkenton

Applicant

K-28 12/10/90

55871	REGISTRATION CARD		Nº 73967	Nº 739676 G	
(Par Office Upo)	Date: 23	The state of the s	1441/68		
Name: Last TARKENTON	First CHRL	Middle or Initial	(Precinct) Maiden		
Residence Address: 100 W	EXFORD PL		Apt.		
Town or City Athens	County	State GD.	Zip Code 30 6	04	
Place of Birth: City	County CLARKE	SING GR	Dale /2-	7 - 6.	
Sex: M Height: 5"// "Rec	S.8. 2452 A	(II known) Perm	seletance in Voting be required itsed by Code Sec. 21-2-409? L	In the man	
Mother's Maiden Name: MASSEY	Father's D. M.	TACKENTI NOI. N	o. (Il Available) 57/1-	78%	
	QUESTIONS PROPO	UNDED TO APPLICAT	IT		
Have you ever then possibled in any co- other state with imprisonment in the peritor- doned, what was the date of the perdon? It is	itiary? If so, what was the offen	se, fire place, and court of co	nviction and the approximate date? (
congo, Clarke	DATH OF	APPLICANT			
I do tweer (or effirm) that I em e citizen of			hat I am at least 18 years of age, or he qualifications of an elector regula		
of this Reales that I am not realistered to vote	in any other County; or I am tel	elstered in		County of t	
correctly answered the questions appearing (placediana on this card under the	e words: "Questions Propou	nded to Applicant:" and that the ini	ormetion to	
teined on this cord is true. Swarn to (nr affirmed) and subscribed before following incation:	millows .	day of de	Thirland)	J. F. M.	
form No. RC-82			(Deputy) Registrar		

D. L.	REGISTRATION CARD Date: Augus Prul on TP 87		030591 }	
(For Office Use)	Date: August	(Day) (Year)	5	
	,	Middle	(Precinct)	
Last Tarkenton	First Stephen	or Initial Dwight	Maiden	
Residence Address: 138 Bo	one Drive	Apt.	Tel No. (If Available) 253-2561	
Town or City Newnan	County Coweta	· State GA	Zip Code 30263	
Place of Birth: City	County Clarke	States GA	Date of Birth: M8/286-52-v.	
Sex: M Height: 5 6" Rac	S.S.2 <u>5476</u> e: W No.: n	1012 Will assistance in vot tknown by Code Sec. 21-2-409	ing be required in the manner perm	
Mother's Maiden Name: Massey	Father's Name: Dal	las M. Tarkenton		
	QUESTIONS PROP	OUNDED TO APPLICANT		
Have you ever been convicted in any cour state with imprisonment in the penitentiary? If was the date of the pardon? If sentence has be NO	iso, what was the offense, the en completed, what was the da	place, and court of conviction and the a ite of completion?		
Georgia,Coweta	OATH OF	APPLICANT		
t do swear (or affirm) that I am a citizen of	the United States, the State	of Georgia and this County; that I am	at least 18 years of age, or will be on the allflications of an elector regulfed by the law	
of this State; that I am not registered to vote in State of	any other County; or I am regis and request cancellatio	tered in <u>Clarka</u> n of my registration; that I am not regist	County c1! gred to vote under any other name; that i ha	
correctly answered the questions appearing a on this card is true.	isewhere on this card under th -	(Sign here)	Tank	
Sworn to (or affirmed) and subscribed before m following location:	ne this	215 001 C	anella	
Form No. RC-84		0	with Registrer	

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EXHIBIT F

FCC FILINGS FROM WHICH
HANDWRITING SAMPLES WERE OBTAINED

The signatures shown of Christopher Tarkenton, Dallas Tarkenton III and Stephen Tarkenton in Exhibit E are taken from the following documents filed at the FCC, copies of which are attached hereto:

```
Q-1
        FCC Form 301, BPH-880601MX, Hogansville, GA, cover
        letter
Q-2
        FCC Form 301, BPH-880601MX, Hogansville, GA, p. 23
Q-3
        FCC Form 301, BPH-880601MX, Hogansville, GA, p. 24
Q-4
        BPH-990601MX Proof of Publication
        FCC Form 314, WCOH, p. 11
FCC Form 314, WCOH, contract for sale
Q-5
Q-6
Q-8
        Dec. 12, 1985 letter to FCC, Re: WCOH Transfer
Q-9
        WCOH FCC Form 323, March 27, 1986, p. 1
0 - 10
        WCOH FCC Form 323, March 27, 1986, cover letter
0 - 11
        WCOH FCC Form 323, July 10, 1987, p. 1
Q-12
        WMKJ, BAPLH-870728HK, FCC Form 314, p. 12
Q-13
        WMKJ FCC Form 323, p. 1
Q - 14
        WCOH FCC Form 323, p. 1
0 - 15
        WCOH FCC Form 303-S, BR-881109UC
0 - 16
        WCOH letter in lieu of FCC Form 323, Dec. 6, 1989
Q-17
        WCOH letter in lieu of FCC Form 323
Q-18
        WMKJ FCC Form 323, filed Nov. 30, 1990, p. 1
Q-19a
        FCC Form 301, BPH-870720MU, Lafayette, FL. p. 23
Q-19b
        FCC Form 301, BPH-870720MU, Lafayette, FL, p. 24
Q-20
        BPH-870720MU amendment filed Sept. 28, 1987
Q-21
        BPH-870720MU Proof of Publication
Q-22
        BPH-870720MU amendment filed Oct. 21, 1987
Q-23
        BPH-870720MU letter of voluntary withdrawal
Q - 24
        FCC Form 301, BPH-900417MU, Zebulon, GA, p. 25
Q-25
        FCC Form 301, BPH-900417MU, Zebulon, GA, cover letter
Q-26
        BPH-900417MU Proof of Delivery
Q - 27
        BPH-900417MU amendment filed July 6. 1990
```

- BPH-900212MM, Blackville, SC, amendment filed Aug. 7, K-21
- 1990
 BPH-900718MM, Unadilla, GA, amendment filed Dec. 13, 1990 K-26

CHRISTOPHER N. TARKENTON 100 WEXFORD PLACE ATHENS, GA 30606

DUPLICATE

May 31, 1988

Mr. H. Walker Feaster, Acting Secretary FEDERAL COMMUNICATIONS COMMISSION 1919 M Street, NW Room L-18 Washington, DC 20554

Application for New FM Channel 248A - Hogansville, Georgia RECEIVED

301 and associated exhibits, filed by Christopher N. Tarkenton, requesting authority to construct and operate a new FM broadcast station on Channel 248A at Hogansville, Georgia.

In Report No. W-39, the filing window for Channel 248A was designated to open on April 22, 1988, and close on June 2, 1988. Thus, this application is timely filed.

The required Public Notice and local Public Inspection File will be timely published and established, and an appropriate notice will be filed with the Commission.

The \$1800 filing fee is attached hereto.

If there are any questions, please advise.

Respectfully submitted,

Chartenly n Toutenton

Section VI	EQUAL EN	APLOYMENT OPPORTUNITY	PROGRAM	
1 Does the applicant pro	pose to employ live or more	full time employees?		Yes X No
* Yes, the applicant mu	ist include an EEO program c	alled for in the separate Mode	el EEO Program (FCC 396-A).	
i.				
Section VII		CERTIFICATIONS		
Has or will the applicar Rules?	nt comply with the public not	tice requirement of Section 7	3.3580 of the Conmission's	X Yes No
		th, that the site or structure p I be available to the applicant		X Yes No
If No, attach as an Exh	ibit, a full explanation.			n/a
	ined such reasonable assurar	s ownership of the proposed nce by contacting the owner o		
JIM LASSIT	ER		(404) 637-8999	
Name of Person Cor	ntacted	_	Telephone No. (include are	a code)
Person contacted:	(clieck one box below) X Owner's Agent	Other (specify)		
Applicant's Signatur	e 9). Tarke	ator	MAY 31, 1988	1

The APPLICANT hereby waives any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations, and that all exhibits are a material part hereof and incorporated herein.